

You gentlemen of the FCC have some serious work to do in repairing the harm you've inflicted upon the American people and their information distribution system.

When I was in television broadcasting many years ago, corporations could only own FIVE television stations and SEVEN radio stations. They could NOT own multiple stations in a given ADI or broadcast area. They could NOT cross-own newspapers AND broadcast facilities.

Most importantly, in my view, their licenses had to be renewed every THREE years, not eight. It was also a requirement, as part of the license renewal process, that the station, through its management and other employees, get off their corporate duffs and go out and meet with "the people" in their ADI, to "ascertain that they were addressing the problems, needs and interests" of the citizens in their ADI or broadcast area.

It is well past the time the FCC must return to those standards, and bring to a screeching halt the rape of the public electromagnetic spectrum you've presided over, aided and abetted, for the past gaggle of years. The citizens of this country require a breadth of diversity in the use of their airwaves if they are to even come close to being the informed citizens the Framers of our Constitution envisioned.

In fact, some court cases notwithstanding, I'm of the opinion that the Ninth Amendment bars the federal government from meddling, in any way, with the citizens' retained, unenumerated right, to use any and all means of communication that have been, are, or will have been developed--that includes radio, television, cable, satellite, cellular, land-lines, the internet and whatever communications methodologies may later be developed. (I can imagine laser, infra-red or ultraviolet or sub-sonic methods of communication, for example.)

Furthermore, I believe that the FCC must require of all commercial broadcasters that they disgorge the three extra channels-worth of spectrum they gain when switching from analog to digital broadcasting. Those channels are the people's channels, not the broadcasters' channels.

I would have the FCC require that five or six of those disgorged channels be set aside as public channels, for the free broadcasting of election campaign advertising, all day, all week, all year. Channel One could be for Presidential election campaign advertising; Channel Two for Congressional campaigns; Channel Three for State Gubernatorial and State Executive branch officials' campaigns; Channel Four for State

Legislative races; Channel Five for Municipal elections; and Channel Six for Quasi-governmental election campaign ads--school boards, water districts, transportation districts, Indian reservations (should they wish to participate), and so on. The Federal and state election commissions could be made responsible for the allocation of time on these advertising channels.

This would remove the most pernicious, expensive and corrupting of campaign costs from play, for once and for all, it seems to me--an effect devoutly to be wished for, no matter to what faith, philosophy or party one subscribes.

Furthermore, if individuals campaigning for public office insist that they wish to have their campaign advertising appear embedded in commercial broadcasts, the FCC can manage that problem quite simply. First, the commercial broadcasters could donate that air time/space to the candidates. The commercial broadcasters would be prohibited from charging for the advertising space/time. The campaign finance laws would be changed so that the contribution of that time could not be counted as a campaign contribution. In addition, the commercial broadcaster who would allow one candidate's campaign advertising to be on the air would also be required to make the same or contiguous time slot available to ALL the other candidates for the same office.

All of the ads would be run contiguously, one after another. The order of their appearance would be determined by lot, -- or by rock, paper scissors, if the candidates preferred -- and the broadcaster would be required to cancel whatever programming was necessary to provide sufficient time to run all of the ads together.

Or the commercial broadcasters could refuse to carry any political campaign or political "issue" ads whatsoever, because there would be an ample amount of space on the channels already set aside specifically for political use.

In sum: The FCC must roll back the limits on broadcast station ownership to five television and seven radio stations. The current regulations have not served and do not serve the public interest. And, quite frankly, the Commission, in granting and/or establishing the current regulatory ownership patterns has itself not been serving the public interest, as is there charter and responsibility.

Broadcast licenses must be renewed every three years, and station management must conduct ascertainments again--to establish and/or ascertain whether, in the judgement of the broadcast audience or ADI population, the station has indeed been meeting the problems, needs and interests of the community on whose behalf, and

with whose permission, they operate their stations under license.

And the FCC must set aside whatever broadcast spectrum is required to provide at least six channels in every community, dedicated to the broadcasting of free political campaign advertisements. As a concomitant measure, the FCC shall prohibit broadcasters from accepting any political advertising unless they accept and run the advertising from every candidate running for the same office, and for the same length/duration as the ad they originally chose to run. The ads must be run for free, contiguously, in an order determined by lot or by any other completely random method--and the block of space sufficient to run all the ads in that order must be provided, whether normal programing must be cut to make space for the ads.

Thank you for exercising and fulfilling these essential measures to bring broadcasters back into the role of serving the citizens' interests on the citizens' airwaves.

Bill Wilt